



2. **Richard Connor** (computer forensic expert). Mr. Connor will offer testimony regarding the Telegram app, including the use of the secret chat feature, including how it operates, and how it is perceived by users. He will specifically offer the opinion that a regular user would not perceive that the Telegram secret chat app would involve the destruction of documents. Mr. Connor will offer the opinion that the defendant's use of the Telegram app was consistent with normal usage of the app, with one exception, that the defendant on occasion would use the screen shot feature on her mobile device to create a photographic image of the conversations occurring in the secret chat. Mr. Connor will offer the opinion that there is no evidence that the defendant deleted any of these photos taken of conversations. Mr. Connor will also testify with regard to the defendant's alleged deletion of social media account. Specifically, Mr. Connor will testify that deletion of social media accounts is a common practice similar to changing one's phone number to prevent unwanted individuals from further communications. Mr. Connor will also serve as a foundational witness to documents recovered from the forensic images of the defendant's devices that have not been separately provided to the defendant.

Respectfully submitted this December 23, 2021.

By: /s/ Charles Swift  
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 23<sup>rd</sup> day of December, 2021, I electronically filed the foregoing Defense Preliminary Witness List with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

By: /s/ Charles Swift  
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